



April 8, 2021

VIA ECF

Matthew F. Noone

Direct Phone 215-665-2192

Direct Fax 215-701-2192

mnoone@cozen.com

The Honorable Edward S. Kiel
United States Magistrate Judge
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Praetorian Insurance Company a/s/o Raymond Samoroo v. Air Vent, Inc., et al.;
18-cv-12314; Letter Request

Dear Judge Kiel:

I am pleased to report that Powermax has agreed to participate in a mediation of this case. The parties are circulating the names of proposed mediators and hope to have the mediation scheduled and completed within the next six to eight weeks. Given this development, the parties request a brief stay in the discovery schedule while the parties explore settlement. The parties believe that the money that will be spent in the next six to eight weeks in depositions, discovery and expert reports will be better used to try to settle the case.

The parties would welcome a conference call to discuss this request if the Court is so inclined.

I appreciate your attention in this matter.

Very truly yours,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "M. Noone", written over a light blue horizontal line.

By: Matthew F. Noone

MFN

cc: All Counsel of Record (*via ECF*)

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